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13 UNITED STATES DISTRICT COURT
14 SOUTHERN DISTRICT OF CALIFORNIA

15
16 UNITED STATES OF AMERICA,
17 Plaintiff,
18 v.
19 NICOLE KISSANE (2),
20 Defendant.

21 CASE NO.: 15CR1928-LAB

22 JOINT MOTION TO MODIFY
23 CONDITIONS OF PRETRIAL
24 RELEASE

25 IT IS HEREBY JOINTLY MOVED, by and between the parties that the
26 conditions of pretrial release for defendant, Nicole Kissane, in the above-captioned
27 case, be modified to allow her to travel to the Toiyabe National Forest in
28 Bridgeport, CA from August 19, 2016 through August 22, 2016. Ms. Kissane's
motion is not opposed by the government or Pretrial Services. Ms. Kissane
acknowledges that she is to contact her Pretrial Services Officer prior to, and upon
her return from, traveling. The surety has provided written consent.

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1 The parties respectfully request that this Court issue an order allowing travel
2 to the Toiyabe National Forest in Bridgeport, California from August 19, 2016 to
3 August 22, 2016.

Respectfully submitted,

Dated: August 10, 2016

s/ John C. Ellis, Jr.
JOHN C. ELLIS, JR.
Federal Defenders of San Diego, Inc.
Attorneys for Ms. Kissane

Dated: August 10, 2016

s/ John L. Parmely
JOHN L. PARMLEY
Assistant United States Attorney

Dated: August 10, 2016

s/ Irene Pflaum
IRENE PFLAUM
United States Pretrial Services Officer

CERTIFICATE OF SERVICE

Counsel for the Defendant certifies that the foregoing pleading has been electronically served on the following parties:

John L. Parmley
Assistant U.S. Attorney
via CM/ECF

Irene Pflaum
United States Pretrial Services Officer
via email

Respectfully submitted,

Dated: August 10, 2016

s/ John C. Ellis, Jr.
JOHN C. ELLIS, JR.
Federal Defenders of San Diego, Inc.
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